



HON. SYLVIA O. HINDS-RADIX  
*Corporation Counsel*

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

JOHN SCHEMITSCH  
*Senior Counsel*  
Phone: (212) 356-3539  
Fax: (212) 356-3509  
jschemit@law.nyc.gov

April 26, 2024

**VIA ECF**

Honorable Ona T. Wang  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Patricia Rodney v. City of New York, et al., 22-cv-1445 (LAK)

Your Honor:

I am a Senior Counsel in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, for defendants. Defendants write pursuant to the Court's orders to provide a status update on the progress of discovery.

Following the status conference on April 11, 2024, and the Court's April 11, 2024 Order, defendants note that the following discovery was outstanding: Plaintiff's Document Requests No. 32, related to CCRB files; Request No 34 related to personnel files; and Request No. 37 related to notices of claim for prior lawsuits against defendants. Defendants have produced the closing reports related to the CCRB files per the Court's orders with respect to Document Request No. 32, and, as such, that issue is resolved. Defendants will produce a privilege log related to the personnel files with respect to Document Request No. 34, per the Court's order, by May 3, 2024. Defendants will produce the notices of claim for prior lawsuits against defendants with respect to Document Request No. 37, per the Court's order, by May 3, 2024. As to outstanding discovery regarding ESI, defendants have produced responsive e-mail documents to plaintiff regarding the agreed upon search terms. Defendants do not have an update as to the collection of text messages for the agreed upon terms by April 12, 2024.

Thank you for your consideration herein.

Respectfully submitted,  
*/s/*  
John Schemitsch  
*Senior Counsel*

cc: **VIA ECF**  
*All Counsel of Record*